

TAB "A"

EXCERPTS FROM VALERIE WAKEFIELD DEPOSITION

1 Q. When you work overtime on Saturdays and
2 Sundays, are you in the same location that you
3 work Monday through Friday?

4 A. Sometimes, yes; sometimes, no.

5 Q. What other locations will you work when
6 you work overtime?

7 A. Plant 1.

8 Q. At Plant 1?

9 A. Yes.

10 Q. Are the cleaning duties different at
11 Plant 1 than they are at your
12 Monday-through-Friday location?

13 A. Yeah.

14 Q. How so?

15 A. I don't vacuum at Plant 1. I vacuum at
16 the administrative building.

17 Q. Is there something other than vacuuming
18 at Plant 1 that you do that you don't do at the
19 administrative building?

20 A. Not really.

21 Q. So mostly emptying trash and cleaning
22 restrooms?

23 A. Cleaning restrooms, offices, yeah.
24 Basically the same.

25 Q. Were you ever terminated from any of

1 A. No.

2 Q. Are you still seeing a psychiatrist?

3 A. No.

4 Q. When is the last time you saw a
5 psychiatrist?

6 A. I don't remember. It was Jennifer, so.

7 Q. Jennifer?

8 A. Pasternack.

9 Q. Oh, okay. So the last psychiatrist you
10 saw was Dr. Pasternack?

11 A. Yeah.

12 Q. And that has not -- you haven't seen
13 her since she moved to an office in Warren?

14 A. Right.

15 Q. Forgive me. How far is Warren from
16 here?

17 A. It's quite a ways.

18 Q. Like a half an hour, an hour?

19 A. I'm thinking two and a half hours.

20 MS. COCHENOUR: Off the record.

21 (Brief recess.)

22 Q. When you returned to work at the end of
23 April of 2002, what is your first memory of
24 seeing Larry Meade?

25 A. I just remember him coming up to me,

1 just asking me, how is everything going, are
2 you doing okay. Just a basic, brief
3 conversation.

4 Q. Do you remember when that happened?

5 A. First day I was back.

6 Q. What happened after that? Let's say
7 take me to May. Do you have any recollection
8 of anything happening with Larry in May of
9 2002?

10 A. He would make it a point to see me
11 every single day no matter what I was doing,
12 where I was at. Just checking on you, seeing
13 how you're doing.

14 Q. Were you generally doing okay?

15 A. There was days no. He would ask me,
16 you know, you're not looking good today, what's
17 wrong?

18 Q. This was in May?

19 A. Yeah. Yeah. And then if he didn't see
20 me he would ask somebody if they seen me, where
21 was I. It just seemed that he made it a point
22 that he had to see me every day.

23 Q. That's your assumption, that he had to
24 make it a point to see you every day?

25 A. He did make it a point to see me every

1 day.

2 Q. When you say "make it a point," what do
3 you mean?

4 A. That if I wasn't in an area that he
5 thought I should be in, he would ask somebody
6 where I was at, because then the next day they
7 would say, hey, Larry was asking about you.

8 Q. This was in May?

9 A. Yeah.

10 Q. How about June?

11 A. Basically the same.

12 Q. When he would see you, about how long
13 would the two of you be in each other's
14 company?

15 A. Maybe two minutes. Maybe three
16 minutes. Maybe five minutes. All depends on
17 what we were talking about that day.

18 Q. Anything else about June 2002 that you
19 wanted to tell me?

20 A. It's been so long ago. I can't
21 remember everything. I just know that if I
22 would be cleaning a restroom, and I'd always
23 put the signs up, he would bypass the sign and
24 come right in.

25 Q. In the ladies' room?

1 A. In the men's room.

2 Q. Which men's room?

3 A. The one outside -- on the second floor
4 outside of Peggy Doyle's office. She works in
5 there with the president and stuff.

6 And then down toward the end of the
7 hall, the MIS area, it's around the corner.
8 That one there, too.

9 Q. How close are those restrooms to where
10 Larry works?

11 A. You have to go through a doorway, down
12 some steps, through another double doorway to
13 his area. It was on the same floor, but you
14 had to go through some doors and up some stairs
15 and through another door and down a hallway to
16 get to where I was at, my area was at.

17 Q. Was there a men's room closer to where
18 Larry worked than the one you described outside
19 of Peggy Doyle's office?

20 A. It was probably -- yeah, I'd say.

21 Q. How much closer?

22 A. Not a lot, but it was on his floor
23 where he didn't have to go through any doorways
24 or up any stairs or anything.

25 Q. When was this happening? When was the

1 first time you recall Larry Meade coming into
2 the men's room that you were cleaning?

3 A. Late May, early June.

4 Q. How many times did he do that in May?

5 A. I really can't recall how many.

6 Q. Once or twice?

7 A. Yeah.

8 Q. How about in June, did he do it in
9 June?

10 A. Yeah, quite a few.

11 Q. Once a week, once a day?

12 A. Maybe three times a week.

13 Q. How long would he be in the restroom
14 with you?

15 A. Maybe two, three, four, five minutes.

16 Q. Did you ask him to leave because you
17 were cleaning?

18 A. Lots of times I did, yeah. Maybe a
19 couple times I didn't because he was telling me
20 a story about what he did the night before at a
21 fire rescue and I wanted -- the story was
22 interesting and I just wanted to hear the
23 story; and then he left.

24 Q. Sometimes he would tell you interesting
25 stories?

1 A. Yeah. Yeah.

2 Q. So every time he talked to you in May
3 and June it was not about his son or your son?

4 A. Sometimes it was; sometimes it wasn't.

5 Q. At any time in May of 2002, did you
6 tell anyone in HR what was happening?

7 A. No.

8 Q. At any time in June of 2002, did you
9 tell anybody what was happening?

10 A. No.

11 Q. Let's go to July of 2002. What was
12 happening in July of 2002?

13 A. Basically the same thing that was
14 happening in June.

15 Q. And that is you would see him on a
16 daily basis?

17 A. Ah-huh.

18 Q. He would talk to you about different
19 things?

20 A. Yeah.

21 Q. Sometimes his son?

22 A. Yeah.

23 Q. Sometimes your son; sometimes
24 conversations completely unrelated to your son?

25 A. Yeah; because my son raced a go-cart at

1 that time and he would ask me how Jonathan was
2 doing with his racing and where we went racing
3 at, because we went to various places racing;
4 and he would say about he went over the weekend
5 to visit his son in Pittsburgh, his youngest
6 son in Pittsburgh, and they ate at
7 such-and-such a restaurant and just things like
8 that.

9 Q. Other than the fact that some of the
10 conversations occurred in the men's room, was
11 there anything troublesome about the
12 conversations?

13 A. Not at that time, no.

14 Q. And we're in July of 2002; correct?

15 A. Same thing.

16 Q. At any time in July of 2002, did you
17 tell anyone in HR that you were having problems
18 with Larry Meade?

19 A. No.

20 Q. Who was your supervisor in May, June
21 and July of 2002?

22 A. Wade. I can't remember his last name.
23 He's retired.

24 Q. Wade with a D?

25 A. Yeah. That's his first name, Wade.

1 Q. At any time in May, June or July of
2 2002, did you have any discussions with or tell
3 Wade what was happening with Larry Meade?

4 A. No.

5 Q. In August of 2002, what was happening?

6 A. He started asking more personal
7 questions, like what kind of underwear did I
8 have on that day. I would tell him, none of
9 your business. He would walk up and tell me
10 how pretty I was that morning. He would just
11 say different things about, I don't know why
12 you're working here, you could be working
13 somewhere glamorous; and I told him that I
14 didn't need to be, that I like this job, I was
15 comfortable with this job, I enjoyed it.

16 And it just kept getting more frequent.
17 Each week he would add more to these
18 conversations. He made a comment to me one
19 time about I would look good in a bikini.

20 Q. This was all in August of 2002?

21 A. Ah-huh. He told me that he had a boat
22 that matched the same color as my Jeep, that I
23 would look good on the boat; and I told him I
24 didn't care to be on his boat. He told me
25 about his family having some kind of a cottage

1 in Florida that they go to every year, that if
2 I wanted to that I can go with him there and I
3 can lay on his boat out in the sun; and I told
4 him I didn't want to.

5 Q. Anything else happening in August of
6 2002?

7 A. Not that I can think of off the top of
8 my head.

9 Q. Did you think he was really serious
10 about wanting you to go to Florida and be on
11 his boat?

12 A. At first, no. At first I just thought
13 he was making talk, just flapping his lips,
14 about whatever came to the top of his mind at
15 that time.

16 Q. At any time in August of 2002, were you
17 offended by any of the comments Larry made?

18 A. About the underwear and the bikini and
19 stuff, yeah.

20 Q. What in particular made you
21 uncomfortable? Be specific.

22 A. Well, when he started commenting about,
23 what kind of underwear do you wear.

24 Q. How often did he do that in August?

25 A. I'm thinking maybe once or twice.

1 Q. At any time in August of 2002, did you
2 tell him, Larry, these conversations are
3 getting different, stop it?

4 A. I told him -- yes. I said, I think
5 there comes a time when enough is enough. I
6 don't mind you asking me about Jonathan and
7 daily things that's going on, but I don't want
8 to hear any more comments about what I'm
9 wearing, what I look like. Please don't bring
10 any more of that stuff up.

11 Q. When did you specifically say that to
12 him?

13 A. The end of August.

14 Q. What was his reaction?

15 A. He said, okay.

16 Q. In August of 2002, did you go to anyone
17 at HR and complain about Larry?

18 A. No.

19 Q. Did you complain to your supervisor
20 about Larry in August of 2002?

21 A. No.

22 Q. Is that all that happened in August?

23 A. As far as I can recall, yes.

24 Q. In preparing yourself for your
25 deposition today, did you review any documents

1 to help you remember what may have happened in
2 2002 and in 2003?

3 A. Yeah, I read through things.

4 Q. What did you read through?

5 A. My diary.

6 Q. Okay. Anything else?

7 A. No.

8 Q. In September of 2002, what was
9 happening?

10 A. I wouldn't talk to him as much because
11 I was trying to ignore him. I would go to
12 different areas to clean so that he didn't know
13 -- I like changed my schedule a little bit to
14 try to avoid him. Sometimes he found me;
15 sometimes he didn't.

16 Q. What do you mean you changed your
17 schedule? You changed your work hours?

18 A. No. I would clean areas at a certain
19 time of the day. I switched them around.

20 Q. So you changed your routine?

21 A. Yeah. Yeah, routine.

22 Q. Did it work?

23 A. Yeah, at first.

24 Q. We're still talking about September?

25 A. Yeah.

1 Q. What else was happening in September?
2 So you saw less of him in September than you
3 had in August?

4 A. Right.

5 Q. When you did see him, what was
6 happening?

7 A. He would just start conversations about
8 plans, that they were going to -- him and his
9 family were going to Florida.

10 Q. Did he invite you to go with his
11 family?

12 A. Not with his family, just with him.

13 Q. Did he say he was going alone?

14 A. No.

15 Q. He always talked about going to Florida
16 with his family?

17 A. Yes.

18 Q. And then he would invite you to come
19 along?

20 A. Well, he would -- he invited me not to
21 go with his family but with him at another
22 time.

23 Q. Did he ever tell you that he had a trip
24 planned alone?

25 A. He didn't actually have it planned. He

1 just said that we could go any time.

2 Q. Did you really think he was serious-
3 about the two of you just picking up and going
4 to Florida together at the drop of a hat?

5 A. Days yes and days no, because I told
6 him I wasn't going because I had my own family
7 to do things with and I wasn't going nowhere
8 with him.

9 Q. What else was happening in September of
10 2002?

11 A. I can't remember if it was September or
12 October. He asked me to his house -- to come
13 to his house after work some day to look at the
14 oil painting that he had of his son, that he
15 thought maybe I would want one of my son, that
16 it was -- the person that did it did it very,
17 very nice; and he kept inviting me to go to the
18 cemetery to see his son's headstone.

19 Q. Can we go back to the oil painting for
20 a second? Would that have been something that
21 would have interested you, to have an oil
22 painting of Justin?

23 A. No.

24 Q. Did you tell Larry that?

25 A. Yes.

1 Q. How many times did he ask you or invite
2 you to see the painting?

3 A. Two or three times.

4 Q. I interrupted you. You were going to
5 say that he also asked you to go to the
6 cemetery.

7 A. Cemetery to see his son's headstone.
8 The reason he brought that up was because we
9 were in the process of getting one for our son
10 and I was just putting things through, just
11 ideas of what we wanted to do and what exactly
12 we wanted to put on it and stuff; and he
13 thought maybe it would help if I seen his
14 son's.

15 Q. So you shared with Larry the fact that
16 you and Harold were making plans for Justin's
17 headstone and it was that that prompted Larry
18 to invite you to the cemetery to see his son's?

19 A. Ah-huh.

20 Q. Are your sons in the same cemetery?

21 A. No.

22 Q. Where is Larry's son?

23 A. I think in Seneca.

24 Q. Did you ever go see his son's grave
25 site?

1 A. No.

2 Q. With him or without him?

3 A. No.

4 Q. Have you ever been to that cemetery?

5 A. No.

6 Q. You're not sure if this happened in
7 September or October?

8 A. Yeah, it was in that time frame there.

9 Q. Is that everything that you can recall
10 happening in September and October of 2002?
11 Anything else?

12 A. There was a time when I took my son out
13 to get his picture taken at Wal-Mart; and we
14 were sitting there waiting for his turn to come
15 up and Larry Meade shows up.

16 Q. Where?

17 A. Right at the studio.

18 Q. In the studio?

19 A. Or right outside. We were like this
20 far apart (indicating).

21 Q. You're gesturing "this far apart."

22 A. Like maybe four feet apart from where
23 we were sitting to where he was standing; and
24 he just said, hi. I said, what are you doing
25 here? He said, oh, I heard you telling the

1 girls at work you were going to be out here
2 getting Jonathan's picture taken and thought
3 maybe I'd come out and see you.

4 Q. Is that all he said?

5 A. Yeah.

6 Q. Did he leave?

7 A. No.

8 Q. He stayed right there?

9 A. Yeah.

10 Q. What do you mean, he just stood there?

11 A. Well, he walked away around the corner
12 just a little ways until we were done; and then
13 he wanted to walk with me through the store;
14 but I told him no, I had to go take Jonathan to
15 get some stuff; and then we left.

16 Q. How do you know he wanted to walk with
17 you through the store?

18 A. He says, can I walk with you while you
19 do your shopping?

20 Q. Was he alone?

21 A. Yes; because I asked him, is anybody
22 with you? No, I'm here by myself.

23 Q. Where is this Wal-Mart?

24 A. Cranberry, Pennsylvania.

25 Q. Are there any other Wal-Marts between

1 that Wal-Mart and where he lives?

2 A. No. It's in between here and where he
3 lives.

4 Q. So pretty much the only Wal-Mart in
5 town?

6 A. Yeah. Yeah.

7 Q. Okay. Anything else happening in
8 September and October with regard to Larry that
9 you recall?

10 A. If there is, I have it written in my
11 diary and I can't think of it right now.

12 Q. Are the things that you just shared
13 with me the most important things that happened
14 in September, October?

15 A. Yeah.

16 Q. Are the things that you just testified
17 to the most important things that happened in
18 May, June, July and August?

19 A. Yeah.

20 Q. In September and/or October of 2002,
21 did you report any of what was happening with
22 Larry Meade to your supervisor?

23 A. No.

24 Q. Did you report it to anyone at human
25 resources?

1 A. No.

2 Q. When you got home from Wal-Mart that
3 night, did you mention to Harold that you had
4 seen Larry at Wal-Mart?

5 A. No.

6 Q. Did you introduce Larry to Jonathan?

7 A. Yes.

8 Q. Is that the first time they had met?

9 A. Yes.

10 Q. Did Jonathan ask you who Larry was?

11 A. No.

12 Q. How old was Jonathan then?

13 A. 12, 13.

14 Q. Had you told anybody that day at work
15 that you were taking Jonathan to Wal-Mart to
16 get his picture taken?

17 A. Yeah.

18 Q. Who did you tell?

19 A. Some of the girls I talk to.

20 Q. More than one of them --

21 A. Yeah.

22 Q. -- at a time?

23 A. Yeah.

24 Q. So you told a group of girls?

25 A. Ah-huh.

1 Q. Was Larry anywhere in the vicinity that
2 you saw?

3 A. I didn't see him if he was.

4 Q. You didn't see him at all?

5 A. No.

6 Q. And the next day at work did you say
7 anything to any of the girls that Larry had
8 been at Wal-Mart that night?

9 A. I don't think so.

10 Q. Do you not remember whether you did or
11 you didn't?

12 A. I don't remember if I did or I didn't.

13 Q. Did you ask any of them if they told
14 Larry that you were going to be at Wal-Mart?

15 A. No.

16 Q. Is that everything that you can recall
17 about September and October?

18 A. He had called Cornelia one day when he
19 couldn't find me to see if she knew if I was
20 there; but I can't remember when that was. I
21 can't remember if it was September, October,
22 August.

23 Q. So Larry called Cornelia on a day when
24 you were not there?

25 A. I was there, but he couldn't find me.

1 Q. How do you know he called Cornelia?

2 A. Because Cornelia paged me.

3 Q. And what did she tell you?

4 A. She said, Larry is looking for you, he
5 wants to talk to you; and I asked her, what
6 about? She says, I don't know.

7 Q. And then what happened?

8 A. I let it go.

9 Q. You didn't call him?

10 A. No.

11 Q. Did you ever tell -- during the period
12 May through October of 2002, did you tell
13 Cornelia any of this information about Larry
14 Meade?

15 A. No.

16 Q. No. Let's go into November of 2002.
17 Did anything happen in November of 2002 that
18 was of any interest?

19 A. No, because I basically kept my routine
20 of cleaning not the same every day so that I'd
21 mix it up so he wouldn't see me at different
22 times. When I did see him, he would try
23 talking to me and I would just tell him I was
24 busy, I had to keep moving.

25 Q. When was it -- you said the end of

1 August you said to Larry, enough, I don't mind
2 you talking to me about Jonathan, I don't mind
3 you talking to me about Justin, and I suppose
4 you said to him, I don't mind you talking to me
5 about your son, right, because -- am I correct
6 in assuming that the fact that you both had
7 this mutual tragedy and you both had each other
8 to talk to about it was beneficial to both of
9 you?

10 A. Right.

11 Q. So that was okay with you?

12 A. Ah-huh.

13 Q. In September, October and November then
14 did he stop the other things that were
15 bothering you in August?

16 A. Yeah.

17 Q. No longer asked you about your
18 underwear?

19 A. No.

20 Q. No longer invited you to Florida?

21 A. No.

22 Q. Did he say or do anything in November
23 that was problematic?

24 A. Not really. He would just -- when he
25 did see me, he would just say, hi, how are you

1 doing today? Are you still planning your trip
2 to Florida to see Harold's brothers? Yeah.

3 Q. How did he know that you were planning
4 a trip to Florida to see Harold's brothers?

5 A. Because whenever he said he was
6 planning a trip, I told him we were planning a
7 trip.

8 Q. And were you?

9 A. Yeah.

10 Q. So November comes and goes and is
11 relatively incident free as Larry Meade goes?

12 A. Ah-huh.

13 Q. How about December?

14 A. Basically the same thing.

15 Q. Same thing as November?

16 A. Ah-huh.

17 Q. Incident free, nothing bad happens with
18 Larry?

19 A. Not really, no.

20 Q. Nothing happened in November or
21 December that you felt you should report to
22 human resources?

23 A. No.

24 Q. Nothing happened in November or
25 December of 2002 that you felt you should talk

1 to Harold about?

2 A. Not that I'm aware of.

3 Q. Okay. In December of 2002, was that
4 when you had your family trip to Florida?

5 A. Yes.

6 Q. How was the trip?

7 A. Wonderful. Was there over Christmas.

8 Q. So in November and December you don't
9 tell anybody in HR anything about Larry Meade?

10 A. No.

11 Q. Things are quiet as it goes between you
12 and Larry in those months?

13 A. Yeah.

14 Q. January of 2003?

15 A. I was in the hospital for a week, maybe
16 four days, due to dehydration from the flu.

17 Q. Did you say "due to dehydration from
18 the flu"?

19 A. Yes. So I had gone back to work maybe
20 like January 2nd; and then I didn't go back to
21 work till somewhere around the 15th, 16th due
22 to my sickness.

23 Q. You took a couple of weeks off?

24 A. Yeah. Yeah.

25 Q. So you literally didn't see Larry for a

1 few weeks?

2 A. No.

3 Q. Including if you count the last couple
4 of weeks of December?

5 A. Right.

6 Q. How long were you in Florida?

7 A. Ten days.

8 Q. And you don't come back to the office
9 really for any more than a day or two?

10 A. Right.

11 Q. Until mid January?

12 A. Right.

13 Q. What happens when you get back in mid
14 January, anything?

15 A. He talked to me -- he just come up to
16 me one day and said, where have you been, I
17 thought you were just going to Florida for a
18 quick trip, you know. I said, I was in the
19 hospital, I was really sick. And he was
20 surprised about me being in the hospital. He
21 goes, boy, if I would have known you were in
22 the hospital, I would have come to visit you;
23 and told me just basic things about how bad he
24 felt that I was sick and everything; and I was
25 basically -- just every day he just checked on

1 me. Are you okay? Are you okay? How is
2 Jonathan doing? Is he sick? How is Harold
3 doing? Is he sick? Things like that.

4 Q. In January?

5 A. Yeah.

6 Q. Nothing bad happening, though?

7 A. I can't remember if it was -- it's in
8 that time frame there, end of January into
9 February, where I was in a restroom, in the
10 men's restroom, cleaning near Peggy Doyle's
11 office; and I always do this thing where, is
12 anybody in here? And if nobody responds, then
13 I set my sign up and I go in and start cleaning
14 the men's restroom. Well, he started doing
15 that to me.

16 Q. I'm sorry, started doing what to you?

17 A. Hollering, is anybody in here, knowing
18 that I was in there.

19 Q. This was in January or early February?
20 This is when he started this?

21 A. Yeah; and I would respond, nobody is in
22 here, go away; but, of course, he started his
23 little thing about, I know you're in there, how
24 you doing, and stuff like that; and then a
25 couple days where I was just having -- due to

1 the flu and I just wasn't feeling good and
2 thinking about Justin and everything, he just
3 noticed that I looked pretty bad and asked for
4 -- you know, he goes, I think you need a hug.
5 He goes, I need one, too. I was just like,
6 okay, no problem. Boy, when he went to hug
7 me --

8 Q. Can we stop for a second and ask you a
9 couple questions about that?

10 A. Okay. Go ahead.

11 Q. I'll let you finish that part.

12 A. Okay.

13 Q. He said to you, you look down. Was he
14 right?

15 A. Yes.

16 Q. Tell me exactly what he said about the
17 hug.

18 A. He said, I think you need a hug.

19 Q. Was he right?

20 A. Yeah.

21 Q. And what did you say when he said, I
22 think you need a hug?

23 A. I said, I know I do.

24 Q. Did you say he also said that he needed
25 a hug?

1 A. Yes.

2 Q. Did he say why?

3 A. He just said he was having a bad day.
4 He didn't say why. He just said, I'm having a
5 bad day.

6 Q. Did the two of you hug?

7 A. Yes.

8 Q. You said this was in either late
9 January or early February, right, 2003?

10 A. Ah-huh.

11 Q. Is this the first time he had ever
12 touched you?

13 A. No, he's given me hugs before.

14 Q. He has?

15 A. Yeah.

16 Q. With your permission?

17 A. Yeah.

18 Q. Okay. How often?

19 A. Maybe once a month.

20 Q. Would he just embrace you or would he
21 ask permission?

22 A. He would ask me.

23 Q. And was there ever a time when you
24 said, no, not today?

25 A. Yeah, a couple times I did because I

1 just didn't feel -- no, don't want one.

2 Q. And would he respect that?

3 A. Yeah.

4 Q. This day he said, I think you need a
5 hug; you said, I know I need a hug; he said he
6 needed a hug as well so the two of you mutually
7 and voluntarily embraced?

8 A. Yes.

9 Q. The other hugs that he gave you before
10 this one -- this sounds like a really stupid
11 question, but how would you hug?

12 A. It would just be like a quick hug, a
13 pat on the back and you feel better.

14 Q. Would it be face to face -- a
15 face-to-face hug or a side-to-side hug?

16 A. No, more a side-to-side hug.

17 Q. More a side-to-side.

18 MS. COCHENOUR: Stand up.

19 Q. I'm Larry. Lisa is you. Like this, a
20 hug (demonstrating)?

21 A. No.

22 What do you mean by "side-to-side hug"?

23 Q. Like this (demonstrating.)

24 A. Oh, no. Front to front.

25 Q. What was a side-to-side hug?

1 A. I thought you meant -- you lost me.

2 Q. I'm lost.

3 A. Okay. I thought you meant the
4 side-to-side was more your heads were side to
5 side, they weren't facing directly to each
6 other.

7 Q. Shoulder to shoulder.

8 A. Shoulder to shoulder, yeah.

9 Q. Early hugs were shoulder to shoulder?

10 A. Yeah.

11 Q. We're still getting this wrong. Not
12 like this was a hug (demonstrating)?

13 A. No.

14 Q. More like this was a hug
15 (demonstrating)?

16 A. Yeah, like that.

17 MR. LINDSAY: Do you want to
18 describe what you're talking about?

19 MS. COCHENOUR: Yeah, I know.
20 I'm about to.

21 Q. If I am Larry Meade and Lisa is you, as
22 you're hugging you are face to face, front to
23 front; correct?

24 A. Ah-huh.

25 Q. If I am Larry and Lisa is you, where

1 are my arms, over your shoulders and around
2 your neck?

3 A. Around the waist.

4 Q. Both arms around your waist. And where
5 are your arms?

6 A. Above on the shoulders.

7 Q. On the shoulders. Okay.

8 Is that always the way the hug
9 occurred?

10 A. Yeah.

11 Q. And those hugs are brief?

12 A. Yeah.

13 Q. The hug at the end of January, early
14 February, is it as we just described?

15 A. Yes.

16 Q. Anything else?

17 A. Yes.

18 Q. What happened?

19 A. His hands wandered down onto my butt.

20 Q. Both hands?

21 A. Yes.

22 Q. How tall is Larry Meade?

23 A. Maybe three inches taller than me.

24 Q. How tall are you?

25 A. Five six.

1 Q. So you think Larry is about five nine?

2 A. Yeah.

3 Q. Is Larry thin, heavy, average? How
4 would you describe him?

5 A. I would say he's average.

6 Q. How long from start to finish was this
7 hug?

8 A. Maybe 30 seconds. Maybe not even that.
9 It wasn't real quick, but it wasn't real long.

10 Q. Was it a little bit longer than all of
11 the others?

12 A. Yeah.

13 Q. You say his hands -- you used the
14 phrase wandered down to your butt.

15 A. Yes.

16 Q. Tell me exactly what you mean.

17 A. The hands were always at the back,
18 right on the back.

19 Q. In previous hugs you're demonstrating
20 his hands were always on the small of your
21 back?

22 A. Yeah.

23 Q. Behind your waist?

24 A. Yes. They started there but then they
25 crept down.

1 Q. Both hands; right?

2 A. Yes.

3 Q. And how far down did they creep?

4 A. To almost -- when I realized what he
5 was doing, I pushed him away.

6 Q. Where were his hands when you pushed
7 him away?

8 A. On my butt.

9 Q. At the top of your butt?

10 A. Yeah.

11 Q. Closest to your waist?

12 A. Yeah.

13 Q. Did you feel his hands move from your
14 waist to a little bit below or did they just
15 start there?

16 A. They just like started there.

17 Q. What were you wearing that day; do you
18 remember?

19 A. Jeans and a T-shirt.

20 Q. Short-sleeved T-shirt?

21 A. Yeah.

22 Q. Was that pretty common for you to be
23 wearing to the office in January and February?

24 A. Yeah.

25 Q. When you felt his hands at the bottom

1 of your waist and top of your butt, what did
2 you do?

3 A. I pushed him away.

4 Q. Where did you touch him to push him?

5 A. The shoulders.

6 Q. What did you say?

7 A. "What did you do that for?"

8 Q. What did he say?

9 A. "What did I do? What?"

10 Q. Then what happened?

11 A. I told him to leave.

12 Q. What did he say?

13 A. "I'm sorry. I'm sorry."

14 Q. Did he leave?

15 A. Yeah.

16 Q. Did that ever happen again? Did he
17 ever hug you and put his hands at the top of
18 your butt again?

19 A. No.

20 Q. You say this was at the end of January
21 2003, beginning of February. Did you report
22 that to HR?

23 A. No.

24 Q. Did you report it to your supervisor?

25 A. No.

1 Q. Did you tell your husband?

2 A. No.

3 Q. Did you tell Cornelia?

4 A. No.

5 Q. Did you tell anyone?

6 A. No.

7 Q. After that incident, when is the next
8 time that you saw Larry?

9 A. Probably two days later he tried to
10 apologize to me.

11 Q. What do you mean "tried to"?

12 A. He tried to, but I turned around and
13 walked away and wouldn't listen to him.

14 Q. Why wouldn't you accept his apology?

15 A. I just felt that he knew what he was
16 doing and that he did it on purpose.

17 Q. And you were offended by it?

18 A. Ah-huh.

19 Q. But you didn't report it to anybody?

20 A. No.

21 Q. I still don't understand why you
22 wouldn't accept his apology.

23 A. Because I was being bull-headed.

24 Q. Okay. When is the next time you saw
25 him?

1 A. Maybe three, four weeks later.

2 Q. So you go three or four weeks without
3 even seeing him?

4 A. Ah-huh.

5 Q. This takes us into at a minimum late
6 February. So you didn't see him at all in
7 February basically?

8 A. Ah-huh.

9 Q. Valentine's Day comes and goes in
10 February of 2003, you don't hear from him, you
11 don't see him?

12 A. No.

13 Q. At any time between the end of January
14 2003 -- at any time after the hug that you just
15 described, did you and Larry exchange any other
16 hugs?

17 A. No.

18 Q. The hug that you described in January,
19 February, was that the last hug you and Larry
20 have ever exchanged?

21 A. No.

22 Q. Well, nothing happened in February.
23 You hardly ever saw him in February 2003;
24 right?

25 A. Ah-huh.

1 Q. When was the next hug?

2 A. I'm going to say maybe the end of
3 February, beginning of March. I was at another
4 restroom clear over by MIS area. I was in
5 there cleaning and he hollered in at me; and I
6 asked him what he wanted and he goes, I just
7 want to talk to you. He started talking to me
8 and asking me about how I was doing, I haven't
9 seen you for a while, and wanting to know how
10 everything was going and how my days were
11 going; and he was telling me about his son's
12 birthday coming up, his son that had passed
13 away, his son's birthday coming up and he was
14 upset about that. We just got into talking
15 about the death of his son, how he dealt with
16 his birthday and everything; and he came up --
17 he kept getting closer and closer to me and I
18 kept backing up; and then he finally got close
19 enough to me that he told me that he needed a
20 hug and, dummy me, I agreed to it; and that
21 time he tried hugging me, he tried kissing me
22 that time.

23 Q. Was the hug the same as the hugs
24 previous to the one that you said occurred in
25 late January?

1 A. Yes.

2 Q. It was more just a friendly --

3 A. Yeah, just a friendly --

4 Q. I'll call it a platonic hug. And all
5 the others were friendly, platonic hugs;
6 correct?

7 A. Yeah.

8 Q. Were your positionings exactly the same
9 with this hug that you're now describing as it
10 was back then, your arms over his shoulders and
11 around his neck and his arms around your waist,
12 both arms around your waist?

13 A. Ah-huh.

14 Q. What else happened?

15 Were all those "ah-huhs" yeses?

16 A. Yeses. Sorry.

17 When I tried backing up --

18 Q. You were finished with the hug?

19 A. Right. He wasn't and he kept ahold of
20 me and he turned his head toward mine and tried
21 to kiss me.

22 Q. Where did he try to kiss you?

23 A. On my lips.

24 Q. Where were you facing at that time?

25 A. I was facing forward --

1 Q. And the two of you --

2 A. -- because I was trying to back up.

3 Q. Where were your arms?

4 A. Trying to back up off of him.

5 Q. Okay. Then what happened?

6 A. When he tried that, I pushed him, the
7 front of his shoulders and pushed him.

8 Q. How do you know he was trying to kiss
9 you?

10 A. He just was. I could just tell that
11 his head -- it was so close to me that I could
12 feel his lips right at the corner of my lips.

13 Q. But you were pushing away?

14 A. Before I was trying to push away.
15 Right before I went to release off of his
16 shoulders.

17 Q. Did his lips touch your lips?

18 A. The corner of my lips.

19 Q. What did you say?

20 A. "Why do you continually do this stuff?"

21 Q. What did you mean "this stuff"?

22 A. The touching of my butt, trying to kiss
23 me.

24 Q. I just want to make sure I'm clear
25 here.

1 A. Okay.

2 Q. He touched your butt once?

3 A. Yes.

4 Q. This was the first time he attempted to
5 kiss you?

6 A. Yes.

7 Q. Okay. Those were the only two things
8 you were talking about?

9 A. Yes.

10 Q. What did he say?

11 A. "I don't know why."

12 Q. Did he say, I want to kiss you?

13 A. No.

14 Q. Did he ask you if he could kiss you?

15 A. No.

16 Q. If he had asked if he could kiss you,
17 {what would you have said?

18 A. No.

19 Q. What else did you say to him?

20 A. I told him to leave.

21 Q. And did he?

22 A. Yes.

23 Q. And you're clear in your recollection
24 that this happened end of February, beginning
25 of March 2003?

1 A. It's in that time frame somewhere.

2 Q. In what time frame? Do you mean end of
3 February, early March?

4 A. It could be like the end of March,
5 early February. Like the last two weeks of
6 February, first two weeks of March.

7 Q. Okay. So it was definitely that time
8 frame?

9 A. That time frame.

10 Q. And he left the restroom at that time?

11 A. Yes.

12 Q. Did you report that to anyone at HR?

13 A. No.

14 Q. Did you report that to your supervisor?

15 A. No.

16 Q. Did you tell Cornelia?

17 A. No.

18 Q. Did you tell your husband?

19 A. No.

20 Q. Did you tell anybody?

21 A. No.

22 Q. What happened next? We're in March of
23 2003. Anything happen in March of 2003?

24 A. No, because I kept ignoring him. I
25 wouldn't talk to him.

1 There was a bunch of us girls
2 talking -- there was probably about six of us
3 girls talking about a certain situation that
4 was going to occur the following week.

5 Q. What were you talking about?

6 A. There was some business people coming
7 in from China; and they were just saying about
8 the areas that needed special cleaning and they
9 were just saying about could this be done,
10 could that be done just to make sure that the
11 place looked nice, spic and span for when these
12 people come in.

13 Q. Who were you talking to?

14 A. Tammy Montgomery, Jill Saylor. There
15 was two other girls. I think Debbie Kries
16 (phonetic). I think the other one was Alma
17 Johnson. I think that's who was there; and I
18 was standing beside Jill Saylor; and whenever
19 we were standing there all talking together,
20 Larry Meade walked past and Jill looked at me
21 and said, you need to watch out for that one;
22 and I just looked at Jill and I said, okay. So
23 then --

24 Q. Is that all she said?

25 A. Yeah.

1 Q. Did she point to Larry?

2 A. Yes. "You need to look out for that
3 one."

4 Q. And you responded?

5 A. "Okay."

6 Q. This was sometime in March of 2003?

7 A. Ah-huh.

8 Q. And it was in late February, early
9 March that Larry tried to kiss you?

10 A. Ah-huh.

11 Q. Did you say anything to Jill about that
12 at that time?

13 A. Not right at that time; but later the
14 next day I got her by herself and I said, what
15 did you mean? And she started telling me about
16 what happened to her with Larry Meade after her
17 husband died, told me that he kept coming
18 around her telling her about how pretty she was
19 and how gorgeous she looked and that she was
20 deeply sad, that he could look in her eyes and
21 tell that she was deeply sad, that she needed a
22 friend; and she said he called her at home a
23 few times and kept asking her out; and I just
24 couldn't believe that she was telling me this.

25 Q. Is Jill a pretty woman?